

EMPLOYEE TRAINING

As a generator of hazardous waste and a handler of hazardous materials you have an obligation to provide a certain level of training to your employees. A personal training program shall be designed to ensure that employees are able to respond effectively to emergencies.

I. Hazardous Materials Business Plan Requirements ¹

If you handle hazardous materials in quantities greater than or equal to 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of a compressed gas at standard temperature and pressure, you are required, as part of your hazardous materials business plan, to include a training program which is reasonable and appropriate for the size of your business and the nature of the hazardous materials you handle. The training program must also consider the responsibilities of the employees to be trained. Your training program at a minimum must include:

- ✓ Methods for safe handling of hazardous materials;
- ✓ Procedures for coordination with local emergency response organizations;
- ✓ Use of emergency response equipment and supplies under the control of the handler;
- ✓ Emergency response procedures for a release or threatened release of hazardous materials, scaled appropriately for the size and nature of your business.

Your hazardous materials business plan must include provisions for ensuring that your employees receive initial and refresher training.

II. Large Quantity Generators of Hazardous Waste ²

If you are classified as a Large Quantity Generator (LQG) of hazardous waste you are required to provide training in hazardous waste management for all workers that handle hazardous waste at your site. Your employees who handle hazardous waste must complete a program of classroom training or on-the-job training that teaches them how to perform their duties in compliance with hazardous waste management requirements. A person who is familiar with your emergency procedures or contingency plan and who is trained in hazardous waste management practices must conduct the training. Training should explain why certain tasks must be performed in a certain manner. It must also stress their roles and responsibilities in an emergency. The basic training requirements are:

- ✓ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- ✓ Communications and alarm systems;
- ✓ Response to spills, fires, and explosions;
- ✓ Response to groundwater contamination incidents;
- ✓ How to shut down operations;
- ✓ Emergency notification procedures; and
- ✓ Operation of automatic waste feed cutoff systems (if applicable).

Training must be provided within six months after the date of employment or assignment to hazardous waste management duties. Employees who have not completed the training shall not work in unsupervised positions. An annual review of the initial training is also required.

In order to document employee training you must maintain the following records at your facility:

- ✓ The job title and a written job description for each position related to hazardous waste management;
- ✓ The job description for each position must include the required skills, education, or other qualifications and duties of employees assigned to each position;
- ✓ The name of the employee filling each job;
- ✓ A written description of the type and amount of training (introductory and continuing) that will be given to each person filling the positions listed above; and
- ✓ Records that document the requirements for training or job experience have been met.

III. Small Quantity Generators of Hazardous Waste³

If you are a Small Quantity Generator (SQG) you have minimal training responsibilities. You must ensure that all of your employees are familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. Although as a SQG there is no legal mandate for training documentation, it is highly recommended as a tool to demonstrate compliance with this requirement. It is also recommended that employees receive annual refresher training.

IV. Recommendation

It is recommended that you incorporate your training plan and procedures required under the Hazardous Materials Business Plan requirements with those required of you as either a LQG or a SQG. Be prepared to demonstrate during an inspection your evidence of a training plan and how you train your employees.

REFERENCES:

1. California Health & Safety Code Section 25504
2. Title 22 California Code of Regulations (CCR) Section 66262.34(a)(4) and Section 66265.16
3. Title 22 CCR Section 66262.34(d)(2) and CFR 40 Section 262.34